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September 20, 2019

Honorable Christian F. Hummel
United States District Court
Northern District of New York
James T. Foley U.S. Courthouse
445 Broadway, Room 441
Albany, NY 12207

Re: *NRA v. Cuomo, et al*
Northern District of New York
18-CV-566 (TJM)(CFH)

Dear Judge Hummel:

I write pursuant to the Court's Order at Dkt. 121 and relative to the Defendants' production of material for the Court's in camera review. The subject material, together with a privilege log, is being provided to the Court contemporaneously with this letter, which is being filed on the Court's ECF system to reflect the Defendants' compliance with the Court's Order.

It should be noted that in the course of compiling these documents Defendants determined that there are no documents reflecting communications between the Defendants and financial institutions/insurers doing business with the NRA [Dkt. 121 at pg. 47], aside from communications by and between DFS, Lockton, Chubb and Lloyds, in the course of DFS' investigation of said entities, and the correspondence that has already been provided to the Plaintiff in the Defendants' discovery responses.

Lastly, in a good faith effort to comply with the Court's Order as it relates to communications between the Defendants about the current litigation, documents and emails were identified that consist of communications between the Defendants and this Office as the Defendants' litigation counsel. These communications have not been produced as they seem to clearly be outside the scope of any proper discovery demand, and the scope of the Court's Order.

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The Court's continued attention to this matter is appreciated.

Respectfully yours,

s/ William A. Scott

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